

TELEPHONE (212) 349-9190

**MARTIN J. SIEGEL**

ATTORNEY AND COUNSELLOR AT LAW

*Suite 600  
170 Broadway  
New York, NY 10038-4464  
Fax (212) 349-1451*

MEMBER OF THE BAR OF:  
NEW YORK  
CALIFORNIA  
DISTRICT OF COLUMBIA

April 7, 2011

Honorable Kiyo A. Matsumoto  
US District Court  
225 Cadman Plaza  
Brooklyn, NY 11201

Dear Judge Matsumoto,

SUBJECT U.S.A V. RUSSO (LOUIS VENTURELLI) 11 CR 30

I am counsel for the defendant Mr. Louis Venturelli.

The present bail conditions set the limits of the defendant's travel conditions to the Southern and Eastern District of New York.

Mr. Venturelli's son is a student at Quinnipiac College in Hamden Connecticut. Further, Mr. Venturelli wishes to travel to New Jersey to visit with friends and family.

I have spoken with Mr. Venturelli's pre trial services officer, Ms. Bianca Carter as well as Elizabeth Geddes, Esq. the Assistant in Charge of this matter. Both Ms. Geddes and Ms. Carter have no objection to this request.

Therefore I request that the Court approve a modification in Mr. Venturelli's bail conditions to allow travel to Hamden Connecticut as well as the State of New Jersey.

Your understanding with this request is gratefully appreciated.

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Respectfully yours,

/S/

MARTIN J. SIEGEL

MJS/gk

cc: Elizabeth Geddes, Esq.  
US Attorney's Office